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Attorney for Plaintiff

IN THE UNITED STATES DISTRICT COURT FOR
THE NORTHERN DISTRICT OF CALIFORNIA

Carlin Shoumoun-Nejad,

Plaintiff,

vs.

Commissioner of the
Social Security
Administration,

Defendant.

No. 10-5264 EJD

PLAINTIFF'S UNOPPOSED
MOTION FOR EXTENSION
(with ~~proposed~~ order)

MOTION.

Plaintiff hereby requests additional time in which to file Plaintiff's Motion for Summary Judgment and/or Remand. Pursuant to the granting of a first extension, Plaintiff's motion was to have been filed by May 17, 2011. Plaintiff seeks a second 30-day extension, or until June 16, 2011. This extension request is made necessary by Plaintiff's counsel's need for a longer bereavement leave than anticipated, due to a death and necessary changes in counsel's immediate family. Such extension would/will cause the schedule for Defendant's Cross-Motion and Plaintiff's Reply to be pushed back as much as 30 days.

Defendant, through counsel, stated to Plaintiff's counsel that Defendant does not oppose this request. Plaintiff submits and requests that no hearing is necessary

1 in this motion, as is usual in Social Security litigation (per the procedural order),
2 and also because Defendant would not be harmed by the extension and Defendant
3 does not oppose the request.

4 RESPECTFULLY SUBMITTED on this 17th day of May, 2011.

5
6 /s/
James Hunt Miller, Attorney for Plaintiff

7
8 ORDER (~~PROPOSED~~)

9 PURSUANT TO PLAINTIFF'S UNOPPOSED MOTION, IT IS
10 ORDERED that Plaintiff may have a 30-day extension, or until June 16, 2011, in
11 which to file the motion for summary judgment and/or remand.

12
13 DATE: May 24, 2011

14 
United States District Judge